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9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA

11 In re NVIDIA CORPORATION
12 SECURITIES LITIGATION

13 _____
14 This Document Relates to: All Actions.
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Case No. 4:18-cv-07669-HSG

**UNOPPOSED MOTION, STIPULATION, AND
~~PROPOSED~~ ORDER TO EXCEED PAGE
LIMITATIONS FOR BRIEFING ON
DEFENDANTS' MOTION TO DISMISS**

CLASS ACTION

Judge: Hon. Haywood S. Gilliam, Jr.
Courtroom: 2

Pursuant to Local Rules 7-11 and 7-12, and with consent of Lead Plaintiffs E. Öhman J:or Fonder AB and Stichting Pensioenfonds PGB (collectively, “Plaintiffs”), Defendants NVIDIA Corporation, Jensen Huang, Colette Kress, and Jeff Fisher (jointly, “Defendants”) hereby move the Court for leave to (1) file a motion to dismiss that exceeds Local Rule 7-2(b)’s 25-page limitation by up to 10 pages; (2) allow Plaintiffs to file an opposition to Defendants’ motion to dismiss that exceeds Local Rule 7-3(a)’s 25-page limitation by up to 10 pages; and (3) file a reply to Plaintiffs’ opposition that exceeds Local Rule 7-3(c)’s 15-page limitation by up to 5 pages.

In support of their unopposed motion, Defendants state as follows:

WHEREAS, on May 13, 2020, Plaintiffs filed their First Amended Consolidated Class Action Complaint for Violations of the Federal Securities Laws (the “First Amended Complaint”), which contains 263 separately numbered paragraphs on 83 pages;

WHEREAS, the First Amended Complaint alleges that 13 separate statements made by Defendants over the 18-month Class Period were actionably false under the federal securities laws, and each such statement was made in a separate public document and/or forum;

WHEREAS, on June 29, 2020, Defendants intend to file a motion to dismiss each of Plaintiffs’ claims on the ground that each of these claims fail to state a claim upon which relief can be granted (the “Motion”);

WHEREAS, Defendants are filing one single motion to dismiss on behalf of all four Defendants;

WHEREAS, although Defendants endeavor to keep their Motion as brief as possible, Defendants believe that they cannot adequately address each of their arguments in the 25 pages afforded by Local Rule 7-2(b);

WHEREAS, Defendants submit that their Motion is concise, free of repetition, and addresses only pertinent points and authorities, but that an additional 10 pages is needed to fully address each of the foregoing arguments and supporting authority;

WHEREAS, Plaintiffs intend to file a single opposition to the four Defendants’ motion to dismiss (the “Opposition”);

WHEREAS, although Plaintiffs respectfully submit that their Opposition will be concise, free

of repetition, and address only pertinent points and authorities raised in Defendants' Motion, Plaintiffs anticipate requiring an additional 10 pages beyond the 25 pages afforded by Local Rule 7-3(a) to adequately oppose Defendants' Motion in light of the heightened page limit that Defendants request herein;

WHEREAS, in consideration of the heightened page limits of the Motion and Opposition, Defendants' believe their reply to Plaintiffs' Opposition cannot be adequately stated in the 15 pages afforded by Local Rule 7-3(c);

Accordingly, IT IS HEREBY STIPULATED AND AGREED between the parties, by and through their counsel of record and subject to order of the Court, as follows:

(1) Defendants' Motion may exceed the page limitation in Local Rule 7-2(b) by ten (10) pages.

(2) Plaintiffs' Opposition to Defendants' Motion may exceed the page limitation in Local Rule 7-3(a) by ten (10) pages.

(3) Defendants' reply to Plaintiffs' Opposition may exceed the page limitation in Local Rule 7-3(c) by five (5) pages.

Dated: June 16, 2020

COOLEY LLP

/s/ John C. Dwyer

John C. Dwyer (136533)

Attorneys for Defendants
NVIDIA CORPORATION, JENSEN
HUANG, COLETTE KRESS and JEFF FISHER

1 Dated: June 16, 2020

KESSLER TOPAZ MELTZER & CHECK, LLP

3 /s/ Andrew L. Zivitz

4 Andrew L. Zivitz (Pro Hac Vice)

5 Attorneys for Lead Plaintiff E. Öhman J:or
6 Fonder AB

7 Dated: June 16, 2020

BERNSTEIN LITOWITZ BERGER &
8 GROSSMANN LLP

10 /s/ Jonathan D. Uslander

11 Jonathan D. Uslander (256898)

12 Attorneys for Lead Plaintiff Stichting
13 Pensioenfonds PGB

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15 Pursuant to Civil L. R. 5-1(i)(3), I, John C. Dwyer, hereby attest that the concurrence to the
16 filing of the foregoing document has been obtained from the signatories.

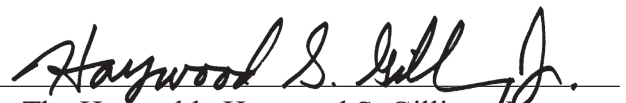
17 Dated: June 16, 2020

/s/ John C. Dwyer

18 John C. Dwyer (136533)

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20 **PURSUANT TO THE STIPULATION, IT IS SO ORDERED.**

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23 Dated: 6/17/2020



24 The Honorable Haywood S. Gilliam, Jr.
25 United States District Judge
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